



**MIDWEST
GENERATION EME, LLC**

An EDISON INTERNATIONALSM Company

US EPA RECORDS CENTER REGION 5



475336

FL *(127)*
Maria L. Race
Senior Environmental Engineer

Interact
CR-ERNS
Processed File

May 3, 2006

Federal Express

CR-ERNS Coordinator

US EPA Region V

Emergency and Remedial Response Section

77 W. Jackson

Chicago, IL 60604

mail code SC-6T

Subject: Continuous Release Reporting

Dear CR-ERNS Coordinator:

Enclosed is a *Written Notification of a Change to Follow-up Report* for each of the following stations:

Crawford Generating Station
Powerton Generating Station
Will County Generating Station

✓ 62614-9

Each notification contains data updates pertaining to continuous hydrogen fluoride releases. New CR-ERNS numbers have been issued for each station's update.

Should you have any questions, please contact me at 312-583-6062.

Sincerely,

Maria L. Race
Senior Environmental Engineer

Attachments

cc: Luke Ford (without attachment)
Craig Lucke (without attachment.)
Joseph Heredia (without attachment.)
Mike Kelly (without attachment)

Midwest Generation EME, LLC
One Financial Place
440 South LaSalle Street
Suite 3500
Chicago, IL 60605
Tel: 312 583 6062
Fax: 312 788 5526
Email: mrace@mwgen.com

**SECTION I: GENERAL
INFORMATION**

CR-ERNS Number: 626149

Date of Initial Release: Unknown

Date of Initial Call to NRC: 10/14/2002

Type of Report: Indicate below the type of report you are submitting.☐ Initial Written Notification☐ First Anniversary
Follow-up
Report☐ Written Notification
of a Change to
Initial Notification☒ Written Notification
of a Change to
Follow-up Report**Signed Statement:** I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge.

John Kennedy, Station Director

Name and Position

April 19, 2006
DateJohn Kennedy
Signature**Part A. Facility or Vessel Information**

Name of Facility or Vessel

Crawford Generating Station

Person
in Charge
of Facility
or Vessel

Name of Person in Charge John Kennedy

Position Station Director

Telephone No. () 773-247-7272

Alternate Telephone No. ()

Facility
Address or
Vessel
Port of
Registration

Street 3501 S. Pulaski Road

County Cook

City Chicago

State IL

Zip Code 60623

Dun and Bradstreet Number for Facility

114466571

Facility/Vessel
LocationLatitude Deg 41 Min 49 Sec 40
Longitude Deg 87 Min 43 Sec 23

Vessel LORAN Coordinates

Part B. Population InformationPopulation
DensityChoose the range that describes the population density within a one-mile radius of your facility or vessel
(Indicate by placing an "X" in the appropriate blank below).

0 - 50 persons

101 - 500 persons

X more than 1000 persons

51 - 100 persons

501 - 1000 persons

Sensitive
Populations
and
Ecosystems
Within One
Mile RadiusSensitive Populations or Ecosystems
(e.g., schools, hospitals, wetlands, wildlife preserves, etc.)

Distance and direction from facility

See Attached.

**SECTION II: SOURCE
INFORMATION**

CR-ERNS Number: 626149

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Name of Source: Stack 5 7 8

1. Indicate whether the release from this source is either:

continuous without interruption ☒ OR routine, anticipated, intermittent ☐

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*

Normal operation of plant, burning subbituminous coal to make electricity.

3. Identify below how you established the pattern of release and calculated release estimates.

| | | |
|--|--|--|
| <input type="checkbox"/> Past release data | <input type="checkbox"/> Knowledge of the facility/vessel's operations and release history | <input checked="" type="checkbox"/> Engineering estimate |
| <input type="checkbox"/> AP-42 | <input type="checkbox"/> Best professional judgment | <input type="checkbox"/> Other (explain) |

Source
previous

? changed
from last report, why?

* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE
INFORMATION
(continued)**

CR-ERNS Number: 626149

Name of Source: Stack #7

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** X (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 378 feet or meters; **OR**

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters.

☒ **SURFACE WATER** (stream , lake , or other)

If the release affects any **surface water body**, give the name of the water body.

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.
stream order: or average flow rate: cubic feet/second; **OR**

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.
surface area of lake: acres and average depth of lake: meters.

☒ **SOIL OR GROUND WATER**

If the release is on or under ground, indicate the distance to the closest water well.

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter 10.25 feet or meters

Gas Exit Velocity 150 feet/second or

300 meters/second

Gas Temperature degrees Fahrenheit,
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity feet/second
of Surface Water

**SECTION II: SOURCE
INFORMATION
(continued)**

CR-ERNS Number: 626149

Name of Source: Stack #8

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** ☒ (stack ☒ or area ☐) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

- If identified source is a **stack**, indicate stack height: 378 feet ~~or meters~~; **OR**
- If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: _____ square feet or square meters.

☒ **SURFACE WATER** _____ (stream _____, lake _____, or other _____)

- If the release affects any **surface water body**, give the name of the water body.

- If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.
stream order: _____ or average flow rate: _____ cubic feet/second; **OR**
- If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.
surface area of lake: _____ acres and average depth of lake: _____ meters.

☒ **SOIL OR GROUND WATER** _____

If the release is on or under ground, indicate the distance to the closest water well.

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter 11.8 feet ~~or meters~~
Gas Exit Velocity 150 feet/second ~~or meters/second~~
Gas Temperature 300 degrees Fahrenheit,
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity _____ feet/second
of Surface Water

SECTION II: SOURCE INFORMATION
(continued)

CR-ERNS Number: 626149

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source: Stack #7

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

| Name of Hazardous Substance | CASRN # | Normal Range (in lbs. or kg per day)* | | Number of Days Release Occurs (per year) | Total Quantity Released in Previous Year (in lbs. or kg)* | Months of the Release |
|-----------------------------|---------|--|-------------|--|---|--------------------------|
| | | Upper Bound | Lower Bound | | | |
| Hydrogen fluoride | 7664393 | 102 lb/day | 0 | 365 | 24,890 lbs | 12 |

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

| Name of Mixture | Name of Hazardous Substance Components | CASRN# | Weight Percentage | Normal Range of Components (in lbs. or kg per day)* | | Normal Range of Mixture (in lbs. or kg per day)* | | Number of Days Release Occurs (per year) | Total Quantity of Mixture Released in Previous Year (in lbs. or kg) | Months of the Release |
|-----------------|---|--------|----------------------|---|----------------|--|----------------|---|--|-----------------------------|
| | | | | Upper Bound | Lower Bound | Upper Bound | Lower Bound | | | |

* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

SECTION II: SOURCE INFORMATION
(continued)

CR-ERNS Number: 626149

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source: Stack #8

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

| Name of Hazardous Substance | CASRN # | Normal Range (in lbs. or kg per day)* | | Number of Days Release Occurs (per year) | Total Quantity Released in Previous Year (in lbs. or kg)* | Months of the Release |
|-----------------------------|---------|--|-------------|--|---|--------------------------|
| | | Upper Bound | Lower Bound | | | |
| Hydrogen fluoride | 7664393 | 113 lb/day | 0 | 365 | 31,615 lbs | 12 |

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

| Name of Mixture | Name of Hazardous Substance Components | CASRN# | Weight Percentage | Normal Range of Components (in lbs. or kg per day)* | | Normal Range of Mixture (in lbs. or kg per day)* | | Number of Days Release Occurs (per year) | Total Quantity of Mixture Released in Previous Year (in lbs. or kg) | Months of the Release |
|-----------------|---|--------|----------------------|---|----------------|--|----------------|---|--|-----------------------------|
| | | | | Upper Bound | Lower Bound | Upper Bound | Lower Bound | | | |

* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

**SECTION III: SUBSTANCE
INFORMATION**

CR-ERNS Number: 626149

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance: Hydrogen fluoride

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of
the Release (specify lbs., kg, or Ci)

Stack 7

102 lbs/day

Stack 8

113 lbs/day

TOTAL - SSI trigger for this hazardous substance release*: 215 lbs

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

The following are a list of schools and their distance and direction from the station:

- Gary Elementary 0.4 mile northeast of station.
- Whitney Elementary 0.5 mile north of station.
- Grace Lutheran 0.6 mile northwest of station.
- Good Shepherd 0.8 mile northwest of station.
- Little Village Academy 0.8 mile northeast of station.
- Blessed Agnes 0.9 miles northeast of station.
- Epiphany 1 mile northwest of station.
- Corkery 1 mile northwest of station.

We are not aware of any other sensitive populations near the station.